



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

JAN 20 1995

Ref: SHWM-FE

Mr. Steven W. Slaten
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Operable Unit 1 Extension Request

Dear Mr. Slaten:

This is in response to your letter of January 6, 1995, in which DOE requested extensions to the current Interagency Agreement (IAG) milestones for Operable Unit 1 (OU 1). It is true that progress is being made in resolving many of the comments submitted by the agencies on the Draft CMS/FS. However, until a draft issue paper was handed to HPA on January 18, DOE had been unable to discuss where the point of compliance would be located for any potential remedial action addressing contaminated groundwater at Operable Unit 1. Making progress on this issue was specifically mentioned in our December 16, 1994 letter as being the basis for further schedule extensions. Submittal of the draft issue paper on point of compliance is a step that should now allow further discussions of this issue. These discussions must begin during the week of January 23. Nonetheless, the resolution of this issue is key to furthering the Operable Unit 1 project and cannot be indefinitely postponed.

At our last meeting on January 9, 1995, it was agreed that additional groundwater modeling runs would be performed to demonstrate the sensitivity and variability of the model results using some different values for selected parameters. So that this may be accomplished and the results incorporated into the Final CMS/FS, EPA and CDPHE are granting an extension of 15 working days to the schedules.

The rationale for DOE's request that the point of compliance and the preferred alternative be deferred to the Proposed Plan is not clear. It does not seem possible to completely evaluate a remedial alternative that does not include a point of compliance. Therefore, this must be included in the CMS/FS report. EPA stated in its comment number 35 dated October 7, 1994 on the draft CMS/FS, that the down gradient side of the french drain would be the most likely point of compliance for OU 1, depending on the remedy selected. This is still the position of EPA and CDPHE. Avoidance of this issue is detrimental to the project and cannot be allowed to continue.

It also seems unnecessary and inefficient to defer proposal of a preferred alternative to the Proposed Plan a month after the Final CMS/FS report. Presentation of the preferred alternative in the CMS/FS makes the most sense, since it is basically the conclusion of such a study. It can also be afforded more technical detail in this format than would be desired in the Proposed Plan. Of course, if there is disagreement about the preferred alternative or other aspects of the Proposed Plan, the three month interval between submittal of the draft and final document should be sufficient time to make necessary changes. For the reasons identified above, EPA and CDPHE grant a fifteen working day extension which establishes the following OU 1 milestones.

DeliverableMilestone

Final CMS/FS

February 13, 1995

Draft PP

February 13, 1995

Final PP

May 18, 1995

Draft Responsiveness Summary

September 19, 1995

Final RS

December 22, 1995

Draft CAD/ROD

December 22, 1995

Final CAD/ROD

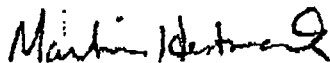
March 29, 1996

Corrective Design/Remedial Design Work Plan

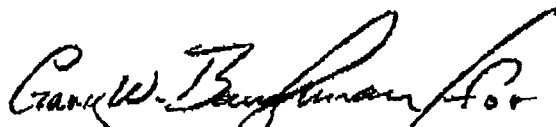
March 29, 1996

If you have any questions regarding these matters, please contact either Gary Kleeman (EPA) at 294-1071 or Chris Gilbreath (CDPHE) at 692-3371.

Sincerely,



Martin Hestmark
Manager
Rocky Flats Project



Joe Schieffelin, CDH
Rocky Flats IAG Unit Leader
Facilities Section
Hazardous Materials and Waste Management
Division

cc: Tim Reeves, SAIC
Mike Rupert, EG&G
Chris Gilbreath, CDH